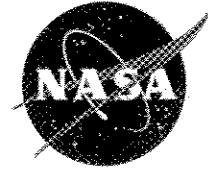


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



November 16, 2009

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

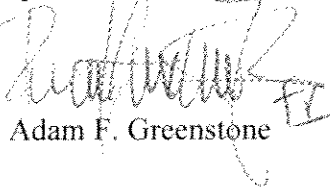
SUBJECT: Determination Regarding Attendance by NASA Employees at an ATK
Retirement Reception for Lynn Heninger on November 19, 2009

On November 19, 2009, ATK, will host a retirement reception at the Rayburn House Office Building, Room B-354, in Washington, DC, from 5:30p.m-7:00p.m. This event is to celebrate the career of Mr. Lynn Heninger.

This event will be a widely-attended gathering of approximately 200 representatives of NASA, the aerospace industry, Congress and their staffers, trade associations, academia, and media. The cost of the reception will be approximately \$20.00 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I have determined that free attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations. The event will provide NASA employees with the opportunity to celebrate the career of Lynn Heninger and honor his 39 years of public and private service as we wish him luck on his next great adventure.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. However, NASA employees whose duties may substantially affect the ATK, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor.

Moreover, NASA employees who are in non-career positions in which Executive Order 13490, requires signing the ethics pledge may only attend if they reimburse the sponsor the cost of the reception for themselves and any accompanying guest.

A handwritten signature in dark ink, appearing to read "Adam F. Greenstone". The signature is stylized with a large, sweeping "A" and "G".
Adam F. Greenstone